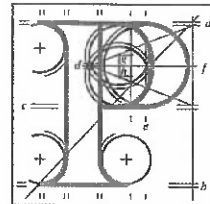


**Our Case Number:** ABP-316025-23



**An  
Bord  
Pleanála**

Northern & Western Regional Assembly  
The Square  
Ballaghaderreen  
Co. Roscommon

**Date:** 15 May 2023

**Re:** Wind energy development including 19 turbines and all associated works.  
Townlands of Clogherachullion, Cloghercor, Derryloaghan, Aghayeevoge, Cashelreagh Glebe,  
Darney, Drumard, and Drumnacross Co. Donegal

Dear Sir / Madam,

An Bord Pleanála has received your submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

The Board will revert to you in due course in respect of this matter.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of Donegal County Council and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: [www.pleanala.ie](http://www.pleanala.ie).

If you have any queries in the meantime please contact the undersigned officer of the Board. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Niamh Thornton  
Executive Officer  
Direct Line: 01-8737247

PA09

|                           |                |  |
|---------------------------|----------------|--|
| <b>Tel</b>                | <b>Tel</b>     | (01) 858 8100  |
| <b>Glaó Áitiúil</b>       | <b>LoCall</b>  | 1800 275 175   |
| <b>Facs</b>               | <b>Fax</b>     | (01) 872 2684  |
| <b>Láithreán Gréasáin</b> | <b>Website</b> | <a href="http://www.pleanala.ie">www.pleanala.ie</a>   |
| <b>Ríomhphost</b>         | <b>Email</b>   | <a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a> |

|                      |                       |
|----------------------|-----------------------|
| 64 Sráid Maoilbhríde | 64 Marlborough Street |
| Baile Átha Cliath 1  | Dublin 1              |
| D01 V902             | D01 V902              |



An Bord Pleanála  
64 Marlborough Street  
Dublin 1  
D02 V902

5 May 2023

|                         |                 |
|-------------------------|-----------------|
| <b>AN BORD PLEANÁLA</b> |                 |
| LDG-                    | _____           |
| ABP-                    | _____           |
| 08 MAY 2023             |                 |
| Fee: €                  | Type: _____     |
| Time: _____             | By: <u>Post</u> |

**RE: PROPOSED DEVELOPMENT OF WINDFARM AT CLOGHERCOR, LETTERMACAWARD, CO. DONEGAL – TOBIN REFERENCE 10798-PB-SID-006**

A chara,

I refer to the above proposal and to the notification as a prescribed body received from Tobin Consulting Engineers on 9 March 2023. The Northern and Western Regional Assembly wish to make the following submission.

This submission outlines the general policy background to Renewable Energy Planning Policy, and the Regional Assemblies role in same, with particular focus on recent participation in the Wind Energy Variation to the County Donegal Development Plan, Wind Energy, as well as landscape policies within the RSES, alongside the forthcoming role of the Assembly in the Regional Renewable Energy Strategies, which will have significant implications for all of our Local Authorities. The submission has concluding remarks outlining the Assembly's position on the project.

## Background

The Regional Assemblies are currently in the process of preparing the framework for Regional Renewable Electricity Strategies (RRES), which is being prepared in partnership with the Department of Environment & Climate Change (DECC) and the Sustainable Energy Authority of Ireland (SEAI). The ambition to deliver these Strategies is set out in the new Government Climate Action Plan (2023) Sec. 12.4; the RSES also contains an objective which initially set out this goal (Rf.RPO 4.16). The Renewable Electricity Strategy, when advanced over the next circa 12-18 months will identify potential sites of scale for potential renewable energy projects, which will traverse County boundaries and will be preceded by the Regional Energy Spatial Planning Framework (RESPF), currently being prepared by DECC. There will also be a significant role for the re-powering of existing projects to substantially increase overall renewable output. It is likely a number of sites across the Northern & Western Region will be prominent in this process.

Northern & Western Regional Assembly  
The Square, Ballaghaderreen, Co. Roscommon

Tionól Réigiúnach an Tuaiscirt agus an Iarthair  
An Chearnóg, Bealach an Dúirín, Co. Ros Comáin

+353 (0)94 9862970

+353 (0)94 9862973

info@nwra.ie

The Regional Spatial and Economic Strategy for the Northern and Western Region (RSES) seeks to deliver better balanced regional development and data arising from the RESFP and the preparation of the RRES can establish a benchmark against various factors, such as land area and population, whilst providing an analysis as to whether an equitable distribution of capacity being distributed is being achieved. The NWRA believe that future energy policy should contain a clear acknowledgement that some areas of the country are already contributing renewable energy output to the grid far in excess of other areas.

Donegal is the County with most constructed wind turbines in the Country, contributing the third greatest share of Wind Energy to the National Grid, behind only Cork and Kerry. This points to a significant concentration of wind energy projects already extant in the County, particularly in some of its upland areas. Additionally, it is apparent from Eirgrid's 'Shaping Our Electricity Future' that there is a clear issue with the grid capacity in the North West, with a constrained network in County Donegal resulting in curtailment (loss of excess) of wind energy generated - this is expressly set out in Sec. 5.4.1 of Shaping Our Electricity Future, where grid overload in the North West is referenced. It is not clear to the Assembly whether this matter is addressed in the Planning Statement accompanying this application.

### **Regional & County Policy**

The RSES contains a number of RPOs which safeguard landscapes and peat bogs (RPO 5.2(a) and RPO 5.22). In June 2022, the Assembly made a detailed submission to the Wind Energy Variation process to the County Donegal Development Plan 2018 – 2024. The view of the Assembly on the Donegal Variation was that the Policy which set out, under EP23 (1) specific safeguarding of identified areas / landscapes, including the Gweebarra Basin was consistent with the RSES. The Variation to the County Donegal Wind Energy Policy was conducted with due regard to current National and Regional Climate Action policy and furthermore was subject to an evaluation by the Office of the Planning Regulator for compliance with the relevant policies. The subsequent Ministerial Direction (August 2022) which served to amend the proposed policy ultimately in its final Direction (distinct from the Draft MD) did not amend or remove the area of the Gweebarra basin from protection, and retained its status as '*Not open to consideration*'. This assessment was based upon the protection of high amenity landscapes, the safeguarding of heritage, the extended setting and protection of the hinterland of one of the country's foremost National Parks, the intrinsic value and maintenance of the distinctive character to Donegal of the Wild Atlantic Way, as well as protection of habitats designated under European law.

The Policy measures to safeguard a number of identified areas in Donegal were retained in the final version of the Ministerial Direction, and accordingly reflected as areas 'Not open to consideration' in the County's Wind Energy Variation.

### Conclusion

It is the view of the Assembly that the proposed Windfarm at Cloghercor is not supported by the Donegal County Development Plan policy on Wind Energy, which, via its recent modification (including EP 23) is considered to be reasoned.

Furthermore, the Assembly does not consider the development is supported by the RSES, and is potentially damaging to the setting and status of both Glenveagh National Park and the Wild Atlantic Way (WAW) Touring Route in South West Donegal.

Accordingly, the proposed project runs contrary to the overarching goals of Section 4.4 of the RSES, as it pertains to the promotion of the Wild Atlantic Way, as well as being contrary to RPO 5.2 & RPO 5.13.

The Assembly acknowledge that there is currently a time lag in the determination of SID applications by the Board and therefore the RESFP and the RRES may have developed further before a decision is made on this proposal and these may be a material consideration in the determination of this proposal. However, within the context of the current RSES and the current County Donegal Development Plan, it is considered that this proposal is contrary to same and is not consistent with the proper planning and sustainable development of the area.

If you have any queries in respect of the foregoing, then the Assembly is at your disposal to clarify same.

Mise le meas,



**David Minton, Director**